UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TENNESSEE
WESTERN DIVISION

ECP COMMERCIAL I LLC,	)	
	)	
Plaintiff,	)	
	)	
v.	)	**CASE NO.: 15-cv-02247-STA-cgc**
	)	
BOAZ SHOPPING CENTER LLC *et al.*,	)	
	)	
Defendants.	)	
	)	

MOTION FOR ENTRY OF CONSENT JUDGMENT

Plaintiff, ECP Commercial I LLC ("ECP") files this *Motion for Entry of Consent Judgment* (the "Motion") and respectfully move the Court to enter judgment in foreclosure in favor of ECP and against Defendants on each count of ECP's January 29, 2016 Second Amended Complaint For Foreclosure, Appointment of a Receiver, and Injunctive Relief (Doc. 65). ECP respectfully requests the Court enter judgment in the form of the proposed order attached hereto as Exhibit A and incorporated herein by reference.

Respectfully submitted, this 22nd day of February, 2016.

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CERTIFICATE OF CONSULTATION

I hereby certify, pursuant to Local Rule 7.2(a)(1)(B), that I consulted on February 22, 2016 with Michael P. Coury, counsel for all defendants, regarding the relief sought in this *Motion for Entry of Consent Judgment*. Mr. Coury informed me that all defendants consent to all relief sought herein.

By: /s/ Jeremy S. Friedberg
Jeremy S. Friedberg

CERTIFICATE OF SERVICE

The undersigned hereby certifies that he has this 22nd day of February, 2016, caused a true and correct copy of the foregoing *Joint Motion for Entry of Consent Judgment* to be served via the court's CM/ECF system to all counsel of record.

By: *\/s/* Jeremy S. Friedberg
Jeremy S. Friedberg